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Attorneys for Defendant, Dr. Sharmalie Perera

Plaintiff,

GARY M. LANIGAN, ET AL.,

Defendants.

CASE NO. 1:17-cv-02864-NLH-MJS

ELECTRONICALLY FILED

**NOTICE OF MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT WITH
PREJUDICE AS AGAINST DR. SHARMALIE
PERERA PURSUANT TO FED. R. CIV. P. 12(b)(6)**

Lauren M. Strollo, Esq.
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Counsel for Defendant, Dr. Scott Miller

PLEASE TAKE NOTICE that on **May 3, 2021** at 9:00 A.M. or as soon thereafter as counsel may be heard, the undersigned, attorneys for Defendant Dr. Sharmalie Perera (“Dr. Perera”), will apply before the United States District Court for the District of New Jersey for an Order dismissing the Amended Complaint against Dr. Perera pursuant to Fed. R. Civ. P.

12(b)(6).

PLEASE TAKE FURTHER NOTICE that Dr. Perera will rely on the brief in support of this motion which is submitted herewith. A proposed form of Order granting this motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that Dr. Perera does not request oral argument on the return date of this motion unless opposition is filed.

NORRIS McLAUGHLIN, P.A.

Attorneys for Defendant, Dr. Sharmalie Perera

By: 
Margaret Raymond-Flood

DATED: April 8, 2021